

DEPARTMENT OF ~~REVENUE~~ SOCIAL SERVICES
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July 14, 1978

ALL-COUNTY LETTER NO. 78-26

TO: ALL COUNTY WELFARE DIRECTORS
FISCAL OFFICERS
ADMINISTRATIVE SERVICES OFFICERS
COUNTY AUDITORS

SUBJECT: COUNTY WELFARE DEPARTMENT ADMINISTRATIVE EXPENSE CLAIM

REFERENCE:

This is to provide claiming and time study instructions for the July - September, 1978 quarter. Included are time study instructions for CWS, IV-D Child Support, Excessive Value Homes (EVH), and Title XX Without Regard to Income (WRTI). In addition, reporting and claiming instructions are included relative to Staff Development, Food Stamp Coordinator, County Counsel, Super/Umbrella Agencies, Memo Billings, Restaurant Meal Allowances, Fair Hearing Witness Fees and Cuban Refugee and Chapter 292 State Funding for the AFDC, Cuban-AFDC, and Food Stamp Programs.

As a result of the above changes, many of the time study and claiming forms have been revised. These forms will be forwarded to counties under separate cover.

The following Administrative Expense Claim forms are to be used to complete the July-September 1977/78 quarter claim:

<u>Form</u>	<u>Revision Date</u>
DFA 46	8/78
DFA 47	7/78
DFA 43	7/78
DFA 323	7/78
DFA 325.1	7/78
DFA 325.1A	7/78
DFA 325.2	7/78
DFA 325.2A	4/78
DFA 325.3	7/77
DFA 327.1	7/78
DFA 327.2	7/78
DFA 327.3	7/78
DFA 327.4	7/78
DFA 327.5	7/78
DFA 327.6	7/78
DFA 327.6A	7/78
DFA 327.7	7/78
DFA 327.8	7/78

FormRevision Date

DFA 403
 DFA 419
 DFA 396
 DFA 394

7/78
 7/78
 10/75
 7/78

Child Welfare Services (CWS)

All-County Letter No. 78-15 dated April 25, 1978 previously implemented time study and claiming instructions relative to changes in allowable Title IV-B CWS activities effective April 1, 1978. Due to time constraints, time study instructions were not included in the April-June 1978 claiming forms revisions. The DFA 46, Social Services Worker Time Study, has now been revised to include those instructions as follows:

Effective April 1, 1978, only the time spent by social workers in providing the following services may be time studied to CWS on the DFA 46, Social Services Worker Time Study. Included is the time spent in assessing the need and arranging for these services.

1. Temporary caretakers for in-home care of children in need of protection because of parents' absence or incapacity.
2. Respite day care as part of a treatment plan on an active child protective services case.
3. Teaching parents homemaker and parenting skills in cases where abuse and neglect occurs or where there is clearly identified and recorded potential for neglect or abuse.
4. Meeting specialized needs such as camp, guardianship studies, tutoring and so forth to benefit the social adjustment of an individual child which are not allowed under Title XX.
5. Arranging for the return of an out-of-state runaway minor who has not been adjudicated under Section 601 or 602, Welfare and Institutions Code.

No time spent in assessing the need for or placement in an Emergency Shelter Care facility is to be recorded to CWS.

The costs of making a protective services worker available to children in need of protection during evenings, nights and weekends must be claimed as a direct charge to CWS on the DFA 325.3, Group III, Personal Services. These costs include only the salaries and benefits of the social workers assigned to this function. No time may be recorded to CWS by these social workers on the DFA 46, Social Services Worker Time Study.

IV-D Child Support

Effective July 1, 1978 Child Support will no longer be considered a separate function for cost allocation purposes. It will instead be treated as a program within the Eligibility and Nonservices function with salaries and benefits of Child Support staff required to time study included in the Eligibility and Nonservice Salary Pool on the DFA 325.1, Group I. In addition, Child Support EDP costing data must be merged with Eligibility EDP costing data. Child Support must then be costed out like other programs by adding the time study hours of the Child Support staff as a new line item (Line R) on the DFA 43 Eligibility and Nonservice Time Study. Child Support cases on computer must be included in eligibility cases on computer.

This change was made for the following reasons. Recently, all IV-D Child Support activities (with the exception of IV-D welfare fiscal) previously performed by welfare were transferred to the District Attorney. Time study and claiming instructions effective with the April-June, 1978 quarter limited the Child Support time study activities to those most closely aligned to other welfare program activities which are time studied. Further review indicates that (1) the time devoted to Child Support activities by welfare staff is so small as to preclude the necessity to identify it as a separate function, and (2) Child Support activities as currently defined so closely resemble time study activities in the Eligibility and Nonservices function as to allow inclusion of them in that function.

In addition to the inclusion of Child Support activities as an Eligibility and Nonservice function on the administrative expense claim, time study instructions for Child Support activities have been further defined as follows:

1. Time spent by workers involved in handling child support obligations collected by the District Attorney's Office is to be charged to Child Support on the DFA 43, Line Q. Include only that time spent on calculating recoupment, pass-on and disbursement of funds to proper parties.
2. Only the following staff may time study to Child Support:
 - a. Clerical staff engaged in performing activities as listed in 1 above and their first-line supervisors.
 - b. Eligibility Workers or Social Workers performing in any one of the above capacities on a full-time basis.

Excessive Value Homes (EVH) Program

Counties were notified in All-County Letter No. 76-144, dated December 29, 1976 of the phase-out of the EVH Program subsequent to conversion of EVH recipients to the SSI/SSP Program. All phase-out activities were to have been completed by June 30, 1977. This deadline was later extended to June 30, 1978. Effective July 1, 1978 there will be no reimbursement for time spent relative to EVH activities. The DFA 43, Eligibility and Nonservice Time Study, State Adult programs, Line I, has been revised to eliminate the EVH Program.

Title XX Without Regard to Income (WRTI)

Instructions on DFA 46, Social Services Worker Time Study, Item E, WRTI, have been revised to include the clarifying information provided in All-County Letter No. 78-11 issued April 21, 1978 as follows:

Without Regard to Income Recipients are individuals who receive the following services without regard to their income and who are not under the AFDC, SSI/SSP or MNO Programs. There is no need for recipient certification to receive the following services.

1. Appeals/Fair Hearings - Functions include the following activities, subsequent to a filing for fair hearings: Prehearing contact with the claimant; attempt to resolve difficulty; explanation of fair hearing rights and procedures; preparation of county position statement; fair hearing activities; posthearing contact with DBP when requesting a rehearing. Record all time to Category E, WORTI, 2., Appeals/Fair Hearings, on the DFA 46, Social Services Worker Time Study.
2. Information and Referral - Activities performed by social service staff to enable persons to have current and accurate knowledge about the available public and private resources available to help alleviate socio-health problems; short term help to enable persons to identify and gain access to resources appropriate to their needs. Record all time to Category E, WORTI, 3., All Other Services, on the DFA 46, Social Services Worker Time Study.

Note: Time spent in performing the services below must be only for those cases for which a goal of protection has been established. These services must be directed toward that goal of protection. For definitions of specific service, refer to the state and county's services plan.

1. Family Planning Services - FAMILY PLANNING SERVICES PROVIDED TO WITHOUT REGARD TO INCOME RECIPIENTS MAY ONLY BE PROVIDED TO THOSE RECIPIENTS WHO ARE ACTIVELY RECEIVING PROTECTIVE SERVICES FOR CHILDREN OR COURT-ORDERED OUT-OF-HOME CARE FOR CHILDREN. Record all time to Category E, WORTI, 1., Family Planning, on the DFA 46, Social Services Worker Time Study.
2. Protective Services for Children - Record all time to Category E, WORTI, 3., All Other Services, on the DFA 46, Social Services Worker Time Study.
3. Protective Services for Adults - Record all time to Category E, WORTI, 3., All Other Services, on the DFA 46, Social Services Worker Time Study.
4. Child Care Services - CHILD CARE SERVICES PROVIDED TO WITHOUT REGARD TO INCOME RECIPIENTS MAY ONLY BE PROVIDED TO THOSE RECIPIENTS WHO ARE ACTIVELY RECEIVING PROTECTIVE SERVICES FOR CHILDREN OR COURT-ORDERED

OUT-OF-HOME CARE FOR CHILDREN. Record all time to Category E, WORTI, 3., All Other Services, on the DFA 46, Social Services Worker Time Study.

5. Health Related Services - HEALTH RELATED SERVICES PROVIDED TO WITHOUT REGARD TO INCOME RECIPIENTS MAY ONLY BE PROVIDED TO THOSE RECIPIENTS WHO ARE ACTIVELY RECEIVING PROTECTIVE SERVICES FOR CHILDREN OR COURT-ORDERED OUT-OF-HOME CARE FOR CHILDREN. Record all time to Category E, WORTI, 3., All Other Services, on the DFA 46, Social Services Worker Time Study.
6. All Other Services - Other Title XX optional services as provided for in the county's services plan. Record all time to Category E., WORTI, 3., All Other Services, on the DFA 46, Social Services Worker Time Study.

Staff Development

Recent requests from counties have indicated a need to clarify the types of costs that may be claimed as staff development. Listed below are costs which are reimbursable under Staff Development:

1. Salaries and benefits for eligibility staff development personnel assigned at least half time to staff development.
2. Salaries and benefits for Social Services staff development personnel assigned full time to staff development. Salaries and benefits applicable to the time spent by these staff performing other than Social Services staff development activities must be allocated to those activities.
3. Salaries and benefits of eligibility employees in training full time in staff development programs for at least four consecutive weeks.
4. Salaries and benefits of social services employees in training full time in staff development programs for at least eight consecutive weeks.
5. Clerical staff directly assigned to the staff development unit.
6. Purchase or rental of office equipment for qualified training officers and trainees under state approved training programs.
7. Audio-visual aids, technical devices, books, teaching equipment, travel, and per diem.

8. Payments for special courses developed outside the welfare department, costs of instructors, tuition, and fees.
9. Costs of educational leave stipends.

Food Stamp Coordinator

Effective July 1, 1978 the salaries and benefits of welfare staff assigned as Food Stamp Coordinator are to be claimed on the DFA 325.1, Group II, Administrative Support.

County Counsel

This is to clarify claiming instructions for County Counsel relative to FMC 74-4 Cost Plan Information Release No. 19, dated May 19, 1976.

1. Effective July 1, 1977

FMC 74-4 Cost Plan Release No. 19 defines the County Counsel's Office as a central support services budget unit for purposes of preparing the county's FMC 74-4 County Cost Allocation Plan. It also recognizes that a county may feel that the cost/benefit ratio does not justify the effort of going through the allocation procedures, i.e., supporting the allocable cost by appropriate time records or time studies. Under these circumstances the County Counsel's Office may be included among the operating departments in the cost plan in order to receive its share of indirect costs. However, if a county elects to include the County Counsel's Office as an operating department in the cost plan, costs billed to county welfare departments for County Counsel services may only include salaries and benefits applicable to that portion of time spent on identifiable welfare activities by County Counsel staff.

All costs billed to welfare by the County Counsel must be supported by appropriate time records. The time records must reflect only the actual hours recorded to activities eligible for federal financial participation.

According to the U.S. Department of Health, Education, and Welfare (DHEW), the general rules to be applied in determining the eligibility of County Counsel costs for federal financial participation are:

1. That they are necessary and reasonable for the proper and efficient administration of the grant program.
2. That the benefits are identifiable to the county's welfare program, and the costs are allocable.
3. That they are not a general expense required to carry out the overall responsibilities of the local government, or solely for the purpose of discharging the general responsibilities of the County Counsel as the Legal Officer of the county.

Some examples of the types of County Counsel activities related to welfare operations that are allowable include: (a) activities relating to personnel matters (e.g., grievance/terminations); (b) interpretation/opinion of laws and regulations; (c) preparation/approval of contracts; (d) guardianship proceedings; (e) proceedings to remove a child from his home (because of abuse, neglect, etc.); and (f) filing of judgments for collections. In addition, DHEW has indicated that County Counsel costs incurred in the preparation and presentation of a case where the county is a plaintiff, except against the Federal Government, are allowable. However, DHEW also indicated that the preparation and presentation costs incurred by the County Counsel where the county is a defendant are not allowable.

Those counties without a County Counsel may claim similar District Attorney costs relative to welfare operations.

All time study/cost records must be maintained in the County Counsel's office. Those records/costs will be subject to audit by State welfare auditors.

2. Prior to July 1, 1977

Prior to July 1, 1977, County Counsel costs for allowable services provided to welfare were eligible for federal and state reimbursement if developed as follows:

- A. County Counsel was included as a central support agency in the county's approved FMC 74-4 Cost Plan.
- B. County Counsel was included as an Operating Department in the county's FMC 74-4 Cost Plan and costs charged to welfare were developed using an Indirect Cost Rate Proposal (ICRP). The ICRP must have been developed in accordance with FMC 74-4 principles.

Umbrella/Super Agency Costs

All-County Letters No. 77-40 and 78-14 dated September 26, 1977 and April 25, 1978, respectively, notified counties that effective July 1, 1978 all counties having Super Agency or Umbrella type organizational structures encompassing the county welfare department must have prior approval before claiming Federal or State funding. Accordingly, costs of the Super Agency applicable to welfare must be separately identified on the DFA 325.1, Group II, C.4., Super/Umbrella Agencies. Specific amounts which are direct billed or developed by use of the county department's indirect cost rate must be entered on the separate lines provided for that purpose.

Reimbursement of costs will not be allowed unless the county has received an approval for their Umbrella/Super Agency indirect cost rate proposal (ICRP) from the Department of Health, Education and Welfare. Approval procedures were outlined in the aforementioned All-County Letters relative to Umbrella/Super Agency ICRP's.

Memo Billings

All-County Letter No. 78-5 dated February 2, 1978 notified counties that effective July 1, 1978 "memo bills" may no longer be used to claim county welfare administrative expenditures for services purchased from a public agency. Therefore, the county welfare administrative expense claim form DFA 325.1, Group II, C.2., has been revised to eliminate "memo billed" public agency costs as a claimable item.

Restaurant Meal Allowances

Effective July 1, 1978, the maximum restaurant meal allowance will be increased to \$36 per month for each individual. Restaurant meal allowances are to be calculated at 60% of the amount spent on restaurant meals up to a maximum payment of \$36 per month.

This allowance falls within the maximum monthly payment limitations for Homemaker/Chore cases.

Transportation to and from meal sites will not be reimbursed.

Costs as outlined above are to be claimed as direct costs to the Homemaker/Chore program on the DFA 325.3, Group IIIA, Operating Costs.

Reimbursement for such costs are subject to individual county Homemaker/Chore allocation limitations.

Fair Hearings

This is to clarify claiming instructions relative to Fair Hearing witness fees and mileage. Fees and mileage expenses paid to a county subpoenaed fair hearing witness are reimbursable through the County Welfare Department Administrative Expense Claim where they are to be reported on the DFA 325.1 in Group II, B.2, Other Operating Costs. These costs are distributed to program by the time study ratios and reimbursed accordingly. If the witness is a welfare department employee, a fee may not be claimed concurrently with any salary paid for the fair hearing time.

Fair hearing fees and mileage expenses for witnesses requested by the recipient or state are not considered county welfare department administrative costs. Therefore, in these situations payment is provided directly to the witnesses by the State Department of Social Services.

Cuban Refugee

Effective July 1, 1978, funding for Cuban Refugees administrative cost has been changed as follows:

1. Cuban refugees now eligible for a federal AFDC grant-Cuban-AFDC

Funding for this category is as follows:

Title IV-A	50 percent
Cuban Funding	85 percent nonfederal share
State	7.5 percent nonfederal share
Chapter 292 State Funds	7.5 percent nonfederal share

The actual calculation for arriving at federal and state sharing is provided for in the county welfare administrative expense claim on the DFA 327.4, Modification C, Cuban-AFDC Reimbursement (Revision date 7/78)

All claiming and time study instructions previously issued relative to this category remain in effect.

2. Cuban refugees ineligible for an AFDC grant but eligible for assistance under the Cuban Refugee Assistance Program

Funding for this category is now 85 percent federal and 15 percent county. Counties are to continue to claim costs relative to this category on the Cuban Claim AA 223. All claiming instructions previously issued for the AA 223 remain in effect.

Effective October 1, 1978, counties will no longer claim costs on the AA 223 for Non-AFDC Cuban refugee recipients. Non-AFDC Cuban recipients will be required to meet either Title XX or County General Relief eligibility criteria in order to receive federally funded social services or grant assistance. This, in effect, creates a Cuban-GR grant assistance program. Costs of this program for federal fiscal year 1978-79 will be funded 85 percent federal and 15 percent county.

Social Services costs will be funded on the same basis as are all Title XX services.

Costs of providing social services to Non-AFDC Cuban recipients who do not meet Title XX eligibility requirements will be 100 percent county funded.

Formal time study and claiming instructions necessary for implementation of these October 1 changes will be issued at a later date.

State Assumption of AFDC, Cuban-AFDC and Food Stamp Program Administrative Costs

Recently enacted Chapter 292 of the Welfare and Institutions Code provides for the assumption by the state of the normal 1978-79 Fiscal Year county share of administrative costs for the AFDC, Cuban AFDC and Food Stamp Income Maintenance Programs. A separate appropriation was included in this legislation to fund administrative costs. Accordingly, the county welfare administrative expense claim has been revised to reflect Chapter 292 funding provisions for the aforementioned three programs as follows:

1. DFA 327.6, DFA 327.6A and DFA 327.7

Revisions include the deletion of the column on these forms formerly shown as for use by the state in the application of federal audits and the addition of a new column on the DFA 327.7 titled, "Chapter 292 State Funds."

2. DFA 327.4

The Food Stamp Base Year requirements are still in effect. However, the county share of costs have been replaced by Chapter 292 state funds. This change is reflected on Modification B, Food Stamps.

Modification C, Cuban AFDC Reimbursement, Column 7, was changed to delete county share and insert Chapter 292 State Share.

Claiming Form Changes

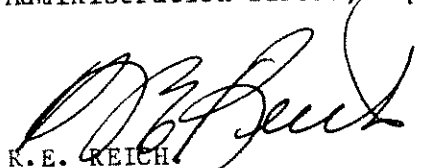
Many of the administrative expense claiming forms were changed effective with the July-September, 1978 quarter. Those changes are detailed below:

1. DFA 325.1 Expenditure Schedule and Certification - Deletes the Child Support Program function while incorporating it into the Eligibility and Nonservice functional category. Provides a breakout of Super/Umbrella Agency costs. Deletes memo billed costs as an allowable cost on the claim.
2. DFA 325.1A and DFA 325.2 Deletes Child Support Program as a separate item and incorporated it into Eligibility and Nonservices.
3. DFA 327.1 Social Service Program Distribution - Lines were re-lettered to coincide with the DFA 47 Social Services Time Study lines. Blank lines P, Q and R were added. These lines are to be used only with special approval from the State.
4. DFA 327.2 Eligibility and Nonservice Program Distribution - A line was added for the Child Support Program.
5. DFA 327.3 Services Modification Worksheet. Minor footnote/heading changes were made.
6. DFA 327.4 Eligibility and Nonservice Modification Sheet - Modification C Cuban-AFDC Reimbursement was added. Modification B, Line 6 was changed to reflect Chapter 292 state funds as replacing county funds.
7. DFA 327.6 Social Services Fund Distribution Report - This page has been split into two pages; the DFA 327.6 which contains only Title XX Program costs and the DFA 327.6A which contains all other services related programs and Staff Development costs. Please note a blank line (K) has been added to the DFA 327.6A. Counties are not to use this line unless specifically instructed to do so by the State. The State Use Only column has been eliminated.

8. DFA 327.7 Eligibility and Nonservice, Nonfederal Fund Distribution Report - A line was added for the Child Support Program. The State Use Only Column has been deleted and a Chapter 292 State Funds Column added.
9. DFA 327.8 Child Support - This form has been eliminated. Child Support costs are included on the DFA 327.7.
10. DFA 327.9 Total Expenditures Fund Distribution Report - This form has been re-numbered as the DFA 327.8. All the above forms changes are reflected on this page.
11. The DFA 419 Claim Summary Sheet, and the DFA 403 Reconciliation of Time Studies to Allocable Salary Pools - Changes in these forms were made to reflect the transfer of the Child Support Program to Eligibility and Nonservice.
12. DFA 394 Review of Social Services Contracts - This form was revised to include the AB 922 Homemaker/Chore and EPSDT Programs.
13. DFA 49 CWD Child Support Time Study - This form has been eliminated. Child Support staff required to time study must use the DFA 43. Please refer to previous instructions contained in this letter relative to Child Support time study instructions.
14. DFA 43 and DFA 323 Eligibility and Nonservices Time Study and Summary - The Child Support Program was added to these forms.
15. DFA 46 and DFA 47 Social Services Worker Time Study and Summary - Blank lines Q and R were added to these forms. These lines are to be used only with special approval from the State. Previously issued clarifying time study instructions for the Without Regard to Income (WRTI) and CWS Programs were incorporated into the DFA 46 Social Services Worker Time Study. Please refer to previous instructions contained in this letter relative to the WRTI and CWS Programs.

PLEASE NOTE: The form DFA 46 Social Services Worker Time Study with an effective date of 7/78 was printed in error. Counties are to destroy this form upon receipt. The correct form DFA 46 for use in the July-September 1978 quarter is the one bearing the effective date of 8/78 in the lower left-hand corner.

All questions concerning this letter should be directed to the County Fiscal Administration Bureau, Department of Social Services, at (916) 445-7046.


R.E. REICH
Deputy Director

Attachments

cc: CWDA